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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 WEBSITE MANAGEMENT SYSTEMS,  
13 LLC, a Nevada Limited Liability  
14 Company

Case No.: 2:20-cv-00213

15 Plaintiff,

16 v.

17 **DECLARATION OF ROBERT LISI IN**  
18 **SUPPORT OF MOTION FOR**  
19 **PRELIMINARY INJUNCTION**

20 BENJAMIN DAILED, an individual  
21 residing in Nevada, MELVIN OMAN, an  
22 individual residing in Nevada, DEVAN  
23 HIRST, an individual residing in Nevada,  
24 YES WE WILL, INC., a Nevada  
25 Corporation, and DOES 1-X,

26 Defendants.

27 **DECLARATION**

28 I, Robert Lisi, declare as follows:

1. I am a Sales Manager/Closer/Trainer for Website Management Systems, LLC ("WMS"). I was hired by WMS on November 11, 2016.

2. On January 24, 2020, I contacted a lead named Katrina Creedon who was generated by our lead generation team.

3. When I reached Ms. Creedon by telephone, she advised me that she had already been contacted by 1<sup>st</sup> Page Group to provide the search engine optimization services and had signed a contract with them. She also advised me that 1<sup>st</sup> Page Group's sales pitch, pitch materials, including website demo, search engine optimization process and fulfillment process

DECLARATION OF ROBERT LISI

1 were the same as those of WMS.

2  
3 I declare under penalty of perjury pursuant to the laws of the United States of America that  
4 the foregoing is true and correct.

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6 Dated: March 2, 2020



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8 ROBERT LISI  
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